UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
X

UNITED STATES OF AMERICA

-VS-

08 Cr 535 (VM)

COREY JONES
JASON JONES

NOTICE OF MOTION AND DEMAND

Defendants

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PLEASE TAKE NOTICE that the undersigned will move this court at a motion term to be held before the Hon Victor Marrero at the Court House, 500 Pearl Street, New York, NY at a date and time to be set by the Court for an order granting mitigation discovery as demanded herein.

Demand

- 1. The names of all potential defendants against whom Frank Jones testified or provided information to the Government., including docket numbers of all cases in which Frank Jones cooperated.
- 2. The Criminal record of Frank Jones.
- 3. Any cooperation agreement entered into between Frank Jones and the government.
- 4. Any probation report in the possession of the government prepared as to Frank Jones.
- 5. A copy of a statement given by Shakienne Jones to the police on or about May 24, 2008.
- 6. Copies of police reports prepared by members of New York Police Department reflecting statements given by Shakienne Jones.

Jason Jones adopts and joins the motion for discovery filed by Corey Jones and the

declaration of Don Buchwald submitted in support thereof.

Yours etc.

Frederick H. Cohn

George R. Goltzer

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